

Statement of Basis
ALFAB, INC
(Shotblast & Surface Coating Processes)
Major Source of Volatile Organic Compound Emissions

Introduction

On September 21, 2010, ALFAB, Inc. submitted an application for the initial Title V Permit for the manufacture and surface coating of aluminum and steel (SIC # 3441). ALFAB, Inc. is located in Enterprise, Alabama.

Operation

The facility manufactures aluminum vehicle pads for parking/driving/landing. They also do some minor structural steel priming of various types. The facility operations consist of metal work, shot-blasting, and surface coating.

The MAT Line No. 1 consists of a priming operation (front and back coating booths) on a monorail, followed by a flash off electric oven, followed by a cooling area, followed by a non skid coating operation (applied in the same booths as priming operation), followed by the same flash off oven, followed by a cooling area, and finally to a hold area for 12 hours until dry. The coating booths are controlled by PM control filters. Each paint booth utilizes airless spray guns to apply the paint. The MAT line contributes the majority of the facilities emissions. The aluminum mats are packaged and stenciled. Another 3 sided metal shed applies touch up paint to the outside of the bundled mats. Military stenciling is also applied at the touch up shed and the shipping yard.

The Stair Line/Miscellaneous Line No. 2 consists of a priming area using conventional guns to apply the primer. Smaller items are hung on a monorail to be painted and dry. No assisted drying occurs on this line. This area has a large 3 sided metal shed where the stairs and other structural steel items are painted.

ALFAB also has a Shot Blasting Operation vented to a baghouse that controls particulate matter from the exhaust system. This operation etches and prepares the aluminum mats for paint preparation.

ALFAB also has a Sand Blasting Operation in a nearby field that has no controls. Large metal pieces are sandblasted before painting. This operation occurs infrequently about every two weeks.

Regulations

Volatile organic compounds (VOCs) from the organic solvents in the paint, paint thinners, and cleanup solvents, are regulated criteria air contaminants emitted to the atmosphere by the surface coating of the metal components. Potential emission of VOCs exceeds the threshold of 100 tons per year. Therefore, ALFAB, Inc. is considered a major source for Title V. ALFAB, Inc. currently has a VOC emission limit of 235 tons per consecutive rolling 12-month period from surface coating in order to avoid PSD requirements.

ALFAB does not emit HAPs potentially above the 10/25 TPY threshold. Therefore, the Maximum Achievable Control Technology (MACT) (MMMMM) for the Surface Coating of Miscellaneous Metal Parts would not apply to the mat manufacturing operation. Nevertheless, ALFAB would meet the existing source limit of 2.6 #HAP/gal coating solids in the general use category with 0.0043 #HAP/gal coating solids in their present coatings. The Area Source MACT would not apply because ALFAB does not use coatings with targeted metals in their paints.

There are no coating New Source Performance Standards (NSPS) or CTGs which would be applicable to this facility. Proposed PM emissions are expected to be minimal from coating operations. Therefore, opacity and process weight regulations are not expected to be exceeded.

Emissions from the Roto-blast with Baghouse are subject to the process weight and opacity regulations. With a baghouse control device, these requirements should be met.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

The following is a list of all of the facility's sources (individual emissions units) which will be part of the facility's Title V Major Source Operating Permit:

Permit Unit No.	Description of Unit
001	Mat Line #1
002	Stair/Miscellaneous Line #2
003	Shot-blast Operation with Baghouse

Monitoring of Emissions

ALFAB, Inc. will continue to maintain records of monthly coating usage and coating analysis. This has proven to be sufficient to show compliance with

their Synthetic Minor PSD limit. These reports will be submitted quarterly by the 15th day of the month following the end of the quarter.

The shot-blast operations are subject to visible emissions and particulate standards. Currently weekly observations of visible emissions are done to maintain compliance with the particulate standards. If greater than normal emissions are noted, corrective action to minimize emissions will be taken within 24 hours. This will be followed by an additional observation to confirm that emissions are reduced to normal. Records of weekly observations and any corrective actions will be retained for at least five years.

The baghouse is equipped with a manometer that identifies when cleaning is necessary. These will be monitored weekly and the baghouse cleaned annually or whenever manometer or visible emissions dictate.

CAM is not applicable because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with control device(s).

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this Major Source Operating Permit will be sent to all affected states bordering Alabama.

Recommendations

I recommend that the attached permit be issued to ALFAB, Inc.

Kevin M. Fulmer
Chemical Branch
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